UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

APR 10 2007

OFFICE OF WATER

Craig Ranger
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RE: ATP # N06-0004; N06-0005, N06-0006; N06-0007; N06-0008; N06-0009; N06-0010; N06-0011; N06-0012; N06-0013; N06-0014; N06-0015; N06-0016; N06-0017; N06-0018

Dear Mr. Ranger:

We are pleased to inform you that we are returning your application for the use of discrete analyzer technology without action. Under recently adopted changes to EPA's Guidelines Establishing Test Procedures for Pollutants, approval for the use of such technology will not be required if certain requirements are met. Consequently, the Engineering & Analysis Division - (EAD) will no longer be reviewing applications for approval of such uses under EPA's Alternate Test Procedures (ATP) program. We recommend that you inform your customers of these recent developments. To assist you, we are providing as an attachment to this letter an explanation of the new approach in a memorandum dated April 2, 2007 Richard Reding ("Flexibility to Modify CWA Methods – Automated Methods").

In the past EAD has issued ATP letters authorizing the use of discrete analyzers as alternative methods when it determined that methods modified for use with discrete analyzers were equivalent and acceptable alternatives to the unmodified CWA method. Now, however, under new-40 CFR Part136.6, laboratories that use a modification to a currently approved CWA method in compliance with the requirements of section 136.6, will no longer require an ATP determination letter. All discrete analyzer methods (or any other method modified pursuant to section 136.6) have the same regulatory standing as any method for which an ATP determination letter had been issued in the past. Thus, both a "lettered discrete method" and a "non lettered discrete method" are authorized test procedures under Part 136 so long as the non-lettered method complies with the requirements of section 136.6.

The purpose of the CWA ATP program, in contrast to section 136.6, is to review (for potential approval) innovative, more effective, or more accurate analytical methods. Our focus is on new chemistries and detectors, or modifications to approved methods that are clearly outside either the scope of the flexibility provided in the underlying approved method, or 40 CFR Part 136.6. We have requested that our ATP coordinators, QA managers, and permit writers support and make use of the flexibility provided in section

136.6. Moreover, we have asked them to encourage their state and local counterparts to allow use of methods, such as discrete analyzers, that have been modified in conformance with 136.6.

In addition, we are providing the following information in anticipation of a number of key questions that may arise among both instrument manufacturers and potential users of the discrete analyzer technology. You should understand that it is permissible to alter buffers and sample-to-reagent ratios as required to improve performance of a method provided the supporting documentation and justification are available for review. For any modified methods, the instrument manufacturer must provide (a) the methods written in EPA format; (b) a table providing a side-by-side comparison of the reference and modified methods and (c) data on calibration, accuracy (recoveries), precision and detection limit. Of course, the user laboratory must follow QC specifications of the method for initial qualification of any new instrument or method that it incorporates into its compliance monitoring standard operating procedures.

We appreciate your interest in the development of environmental monitoring methods. If you have any questions regarding the ATP program please contact me at walker.lemuel@epa.gov.

Sincerely,

Lemuel Walker
CWA ATP Coordinator
Engineering and Analysis Division (4303 T)
Engineering and Analytical Support Branch

cc:
Steve Wendelken, SDWA ATP Coordinator
Richard Reding, Chief, EASB
Mary T. Smith, Director, EAD
Richard Witt, OGC

Attachment – April 2, 2007, Richard Reding Flexbility to Modify CWA Methods – Automated Methods memo.

ATP #	Method
N06-0004	26930806 Ammonia Nitrogen by Discrete Analyzer as an alternate to EPA 350.1
N06-0005	27000806 Chloride by Discrete Analysis as an alternate to Standard Method 4500-Cl E for determination of chloride
N06-0006	OI Analytical DA 3500 Discrete Analyzer Method – Chromium (VI) as an alternate to Standard Method 3500-Cr B for determination of chromium (VI)
N06-0007	2697086 Total Cyanide by Discrete Analysis as an alternate to EPA 335.2 for determination of cyanide
N06-0008	27020806 Nitrite Nitrogen by Discrete Analysis as an alternate to Standard Methods 4500-NO_2^-
N06-0009	26920806 Nitrate + Nitrite Nitrogen by Discrete Analysis as an alternate to EPA 353.3 for determination of nitrate/nitrite
N06-0011	OI Analytical DA 3500 Discrete Analyzer Method - Orthophosphate, Total Acid Hydrolyzable, Dual Reagent as an alternate to Standard Method 4500-P E for determination of orthophosphate
N06-0012	OI Analytical DA 3500 Discrete Analyzer Method - Phenol, Low Range, 4-Aminoantipyrene as an alternate to EPA 420.2 for determination of phenol
N06-0013	OI Analytical DA 3500 Discrete Analyzer Method - Phenol, High Range, 4-Aminoantipyrene as an alternate to EPA 420.1 for determination of phenol
N06-0014	OI Analytical DA 3500 Discrete Analyzer Method - Silica as an alternate to EPA 370.1 for determination of silica
N06-0015	OI Analytical DA 3500 Discrete Analyzer Method - Sulfate, Turbidimetric as an alternate to Standard Methods 4500-SO_4^{2-} E for determination of sulfate
N06-0016	OI Analytical DA 3500 Discrete Analyzer Method - Sulfide as an alternate to Standard Method 4500-S^{2-} D for determination of sulfide

N06-0017	OI Analytical DA 3500 Discrete Analyzer Method - Total Kjeldahl Nitrogen (TKN) by Discrete Analysis as an alternate to EPA 351.2 for determination of TKN
N06-0018	OI Analytical DA 3500 Discrete Analyzer Method - Turbidity as an alternate to EPA 180.1 for determination of turbidity